



4210 East 11th Avenue
Denver, Colorado 80220-3716
Phone (303) 320-8333

Hazardous Materials and
Waste Management Division
Telefax Number: (303) 331-4401

Telefax Numbers:
Main Building/Denver
(303) 322-9076

Ptarmigan Place/Denver
(303) 320-1529

First National Bank Building/Denver
(303) 355-6559

Grand Junction Office
(303) 248-7198

Pueblo Office
(719) 543-8441

ROY ROMER
Governor

JOEL KOHN
Interim Executive Director

January 30, 1992

Mr. Frazer Lockhart
U. S. Department of Energy
Rocky Flats Plant
Building 116
P. O. Box 928
Golden, Colorado 80402

RE: FINAL, PHASE I RFI/RI WORK PLAN, WEST SPRAY FIELD, (Operable Unit No. 11),
U. S. DEPARTMENT OF ENERGY, ROCKY FLATS PLANT, DECEMBER 18, 1991.

Dear Mr. Lockhart,

The Colorado Department of Health, Hazardous Materials and Waste Management Division (the Division) and the U. S. Environmental Protection Agency (EPA) have reviewed the subject document submitted by DOE and prime contractor, EG&G.

Based on our review, the Division, as lead agency, is withholding approval pending resolution of inconsistencies, omissions and inappropriate procedures. As presented, the work plan would be difficult to implement, result in inappropriate sampling procedures and may create subsequent data gaps.

The initial work plan submitted in June, 1990 was highly deficient and necessitated a major rewrite. Although the current work plan has been the subject of closer coordination between the respective DOE, EG&G, EPA and Division staffs, a number of specific issues remain and must be addressed before the Division will grant approval.

The most significant issues prompting the Division to withhold approval are summarized below. The Division's specific comments, and those of EPA, are attached.

- o The field sampling plan (FSP) does not appear to be statistically designed to meet EPA performance measures for data useability in risk assessments.
- o Determination of background concentrations is a plan objective, but a specific background sampling plan is absent from the FSP.
- o The collection procedure for test pit soils fails to recognize the special requirements of volatile and semi-volatile organic compound sampling.
- o The use of inconclusive and highly variable radionuclide studies to support "within background" conclusions is unacceptable and must be revised.
- o The plan should specify whether contamination of all three soil horizons is necessary to warrant soil borings as a Phase I RFI/RI step. If so, DOE must explain the presence of radionuclides in West

ADMIN RECORD

A-DU11-000014

Spray Field alluvial wells.

- o The method of evaluating contamination, as a decision point for bore hole drilling, must be specified. The Division will not support a lengthy process that could delay submittal of the Phase I RFI/RI Report.
- o Inconsistencies in work plan objectives must be reconciled between narrative sections and supporting tables. The activities needed to meet the objectives must also be reconsidered or specified.
- o The terms sediment and soil are not interchangeable; different sampling procedures apply.
- o The use of radiation survey results to modify the non-radionuclide soil sampling grid must be justified.
- o A stronger commitment must be made to radionuclide soil sampling as verification of the germanium survey and to investigate non-gamma emitting radionuclides.
- o Sampling protocols for surficial soil sampling, both for radionuclides and non-radionuclides, must be revised.
- o The proposed number of sediment sample sites is inconsistent. Also, sediment sites are incorrectly proposed for non-stream locations, while several test pits are to be located in streams.
- o The risk assessment section fails to acknowledge the IAG requirement of evaluating risk "at the source" and proposes a risk determination at "some exposure point".
- o The environmental evaluation section suggests the need for additional pesticide, dioxin and PCB data which the FSP does not address.

DOE should carefully consider the shortcomings of this document, as both a conceptual plan and field guide, and submit replacement pages, satisfactory to the Division and EPA, no later than March 16, 1992. Changes should not be submitted as a Technical Memorandum.

If you have any questions concerning these comments, please contact Harlen Ainscough of my staff at 331-4977 or William Fraser of EPA at 294-1081.

Sincerely,



Gary W. Baughman
Unit Leader, Hazardous Waste Facilities
Hazardous Materials and Waste Management Division

Attachments

cc: Daniel S. Miller, AGO
Martin Hestmark, EPA
William Fraser, EPA
Robert Birk, DOE
Paul Bunge, EG&G
Randy Ogg, EG&G
Lee Sobchak, EG&G
Barbara Barry, RFPU